

Donald E. J. Kilmer, Jr. [SBN: 179986]
LAW OFFICES OF DONALD KILMER
1645 Willow Street, Suite 150
San Jose, California 95125
Voice: (408) 264-8489
Fax: (408) 264-8487
E-Mail: Don@DKLawOffice.com

Jason A. Davis [SBN: 224250]
Davis & Associates
27201 Puerta Real, Suite 300
Mission Viejo, CA 92691
Voice: (949) 310-0817
Fax: (949) 288-6894
E-Mail: Jason@CalGunLawyers.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARK AARON HAYNIE, BRENDAN
JOHN RICHARDS, THE CALGUNS
FOUNDATION, INC., and THE
SECOND AMENDMENT
FOUNDATION, INC.,

Plaintiffs,

vs.

KAMALA HARRIS, Attorney General
of California, CALIFORNIA
DEPARTMENT OF JUSTICE, CITY
OF ROHNERT PARK, and OFFICER
DEAN BECKER (RP134)

Defendants.

Case No.: 3:10-CV-01255 SI

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
~~PROPOSED ORDER~~
Re: Case Management**

CURRENT CMC: JUNE 21, 2013

PROPOSED CMC: SEPTEMBER 6, 2013

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for June 21, 2013 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California should be reset.

The Rohnert Park Defendants and the Plaintiffs are still engaged in earnest self-directed settlement discussions.

1 If a settlement can be reached, then the remaining parties (California
2 Department of Justice and the Plaintiffs) will proceed with setting hearing dates for
3 dispositive motions at the next Case Management Conference.

4 Furthermore, the Plaintiffs and the California Department of Justice are
5 aware that several bill have been introduced in the State Legislature that may
6 moot this case or require amendments to the pleadings. Several of those bills have
7 passed at least one legislative house and are pending in the other. Those parties
8 may seek another continuance and/or stay to conserve resources of the parties and
9 the Court.

10 The parties propose that the Court reset the Case Management Conference to
11 September 6, 2013 in order to give the parties engaged in settlement discussions
12 the time necessary to conclude that process or to request formal ADR assistance
13 from the Court.

14 **SO STIPULATED.**

15 Date: June 14, 2013

Date: June 14, 2013

16 /s/
17 Mark Beckington
18 Supervising Deputy Attorney General
19 for Ross Moody,
20 Counsel for Defendants
21 Harris & California Dept. of Justice

/s/
Donald Kilmer
Counsel for Plaintiffs

22 Date: June 14, 2013

23 /s/
24 Robert W. Henkels
25 Counsel for Defendants
26 City of Rohnert Park & Becker

27 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND
28 LOCAL RULE VIII.B.**

I, Donald Kilmer, declare under penalty of perjury under the laws of California
and the United States that I have in my possession e-mail correspondence from
Ross Moody, and Robert Henkels that the content of this document is acceptable to
all persons required to sign the document. I declare that this document was signed
in San Jose, CA on June 14, 2014.

29 /s/
30 Donald Kilmer, Attorney for Plaintiffs

ORDER

The Case Management Conference currently set for June 21, 2013 is reset to:
(Date) 9/6/13, at (Time): 3:00 p.m., in Courtroom 10,
19th Floor of the U.S. District Court for the Northern District of California – San
Francisco. A Joint Case Management Conference Statement shall be filed seven (7)
calendar days before the new date.

Date: 6/17/13



United States District Judge

No further continuances will be granted.